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Attorneys for Defendants
FibroGen, Inc., Enrique Conterno, James Schoeneck,
Mark Eisner, and Pat Cotroneo

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE FIBROGEN, INC., SECURITIES
LITIGATION

Case No. 3:21-cv-02623-EMC

CLASS ACTION

**JOINT STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
DEFENDANTS' ANSWER**

Pursuant to Civil L.R. 6-1(a), Defendants FibroGen, Inc. ("FibroGen"), Enrique Conterno, James Schoeneck, K. Peony Yu, Mark Eisner, and Pat Cotroneo ("Individual Defendants," and collectively with FibroGen, "Defendants"), along with Lead Plaintiffs the Employees' Retirement System of the City of Baltimore, the City of Philadelphia Board of Pensions and Retirement, and the Plymouth County Retirement Association ("Lead Plaintiffs," and, collectively with Defendants, the "Parties"), stipulate and agree as follows:

WHEREAS, on November 19, 2021, Lead Plaintiffs filed the operative complaint in this Action (the "Complaint") (*see* Dkt. No. 97);

WHEREAS, on January 14, 2022, Defendants filed Motions to Dismiss the Complaint (*see* Dkt. Nos. 107, 109);

WHEREAS, on July 15, 2022, the Court denied the Motions to Dismiss (*see* Dkt. No. 126);

WHEREAS, pursuant to Fed. R. Civ. P. 12(a)(4), Defendants' responsive pleading is due

to be served by July 29, 2022, 14 days after the Court's denial of Defendants' Motions to Dismiss;

WHEREAS, the Complaint is 120 pages long, includes 297 numbered paragraphs of allegations, challenging 96 statements, and asserting two causes of action (violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934) against six defendants;

WHEREAS, counsel for Defendants and for Lead Plaintiffs have met and conferred and, at the request of counsel for Defendants, agreed that Defendants shall have 60 days to answer the Complaint;

WHEREAS, the Parties agree that this Joint Stipulation regarding the timeframe for Defendants to answer the Complaint shall not modify, extend, or otherwise impact the case schedule or any other discovery deadline in this Action;

NOW, THEREFORE, THE PARTIES HEREBY STIPULATE as follows:

1. Defendants shall answer the Complaint by September 13, 2022.

IT IS SO STIPULATED.

Dated: July 21, 2022

COOLEY LLP

By: /s/ Tijana M. Brien

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Attorneys for Defendants
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1 Dated: July 21, 2022

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Attorneys for Defendant
K. Peony Yu

9 Dated: July 21, 2022

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Retirement System of the City of Baltimore,
City of Philadelphia Board of Pensions
and Retirement, and Plymouth County
Retirement Association and Lead Counsel
for the Class*

ATTESTATION PURSUANT TO CIV. L.R. 5-1(i)(3)

Pursuant to Civ. L.R. 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the signatories.

Dated: July 21, 2022

/s/ Tijana M. Brien
Tijana M. Brien

[PROPOSED] ORDER

**PURSUANT TO STIPULATION, AND FOR GOOD CAUSE SHOWN, THE COURT
ORDERS AS FOLLOWS:**

1. Defendants shall be permitted to answer the Complaint by September 13, 2022.

Dated: _____

The Honorable Edward M. Chen
United States District Judge